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IN THE UNITED STATES DISTRICT COURT, DISTRICT OF UTAH,
CENTRAL DIVISION

AMERITRADE INTERNATIONAL, INC. a
Utah Corporation and CRAIG D. JONES, a
Utah resident,

Plaintiffs,

vs.

HSN IMPROVEMENTS, LLC, an Ohio
corporation.

Defendant.

**DECLARATION OF GLENN
CHRISTENSEN**

Judge Ted Stewart
Civil No. 2:03CV00459 TS

I, Glenn Christensen, being of lawful age and duly sworn and of my own free will, hereby
state the following based upon my own personal knowledge:

1. I have personal knowledge of the facts set forth herein.
2. I am competent and willing to testify to the facts and opinions set forth in this

Declaration.

3. I am a professor of marketing at Brigham Young University.

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4. One of my areas of expertise is consumer behavior. I am also an expert in the area of qualitative interviews.

5. In the opinions I have expressed in Case No. 2:03CV00459, the *Ameritrade v. HSN* matter, I used three methods for gathering information. Those methods were personal observation, in-depth or qualitative interviews, and a consumer survey or experiment.

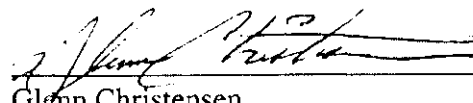
6. All three of the methods utilized are generally accepted among those who are experts in the field of consumer behavior.

7. The source references in my opinion and the articles attached as Exhibit E to the Memorandum in Opposition to the Motion to Strike my opinion are from learned treatises and are widely known and accepted in the field of consumer behavior. The articles in Exhibit E come from the Journal of Marketing Research, which is widely recognized as one of if not the leading journal in the area of marketing research.

8. All of the materials and information that I considered in forming the opinions I have expressed in this case are routinely considered and relied upon by experts in the areas of marketing research and consumer behavior.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 19th day of April, 2005.


Glenn Christensen

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of April, 2005, I caused a true and correct copy of the foregoing **DECLARATION OF GLENN CHRISTENSEN** to be mailed through United States mail, postage prepaid, to the following:

Thomas J. Rossa
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